

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

COMMONWEALTH

v.

ADIANGEL PARADES

Defendant

CRIMINAL ACTION  
NO. 19-40049-TSH

**DEFENDANT'S MOTION IN LIMINE**  
**TO EXCLUDE TESTIMONY OF GOVERNMENT WITNESS: CW-6**

Now Comes the Defendant, and respectfully requests that this Court prohibit the Government from introducing evidence from witness testimony regarding the distribution of controlled substances unrelated to the charges alleged.

Specifically, **CW-6** whom the Government has indicated will be called<sup>1</sup>.

As grounds therefore, the Defendant states that testimony is irrelevant, immaterial and has nothing to do with the charges at issue. Commonwealth v. Varoudakis, 233 F.3d 113, 118 (1<sup>st</sup> Cir. 2000). See also Fed.R.Evid. 402. There is nothing in the Government's trial brief which establishes the use of CW-5 as a relevant witness.

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<sup>1</sup> The Government has provided supplemental disclosures pursuant to L.R. 116.1 and L.R. 116.2 in anticipation of calling this cooperating witness in its case in chief.

Furthermore, even if the Court determines that such a witness possesses probative value, such value is substantially outweighed by the danger of unfair prejudice, confusion of issues, and misleading the jury. Fed.R.Evid. 403.

Boston, MA  
10/6/2022

Respectfully submitted  
By counsel for Adiangel Parades



STEFAN JOHN ROZEMBERSKY, Esq.  
72 Orange Street, Suite 1A,  
Providence, Rhode Island. 02903  
617-877-7388 | Rozembersky.Esq@gmail.com  
 www.RozemberskyLaw.com

CERTIFICATE OF SERVICE

This is to certify that the forgoing document, filed through the ECF system, has been served electronically on the registered participants identified on the Notice of Filing on the date of so noted on the notice on 10/6/2022

/s/ Stefan Rozembersky

Stefan Rozembersky